

Message

From: Miller, David [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=FA0582F5BA6540C687844F9289A4F74F-DAVID J. MILLER]
Sent: 8/19/2020 2:21:11 AM
To: DavidJ Miller [Miller.DavidJ@epa.gov]
Subject: FW: aldicarb - Ag Health study - Lee

From: Taylor, Linda <Taylor.Linda@epa.gov>
Sent: Friday, August 19, 2016 4:47 PM
To: Miller, David <Miller.DavidJ@epa.gov>
Subject: aldicarb - Ag Health study - Lee

David, I need your help in addressing Earthjustice's comments on the aldicarb DRA regarding aldicarb's cancer classification and HED's failure to consider evidence of cancer from the 2007 Lee study (Pesticide use and colorectal cancer risk in the Agricultural Health Study). The two paragraphs below are their comments. Any suggestions on how to address this? Thanks for your help. LT

In a study of pesticide applicators in the Agricultural Health Study cohort published in 2007, Lee and colleagues reported that exposure to aldicarb (ever versus never) was significantly associated with colon cancer and that a significant positive dose-response trend between lifetime exposure days and colon cancer was observed.¹⁰ These results fundamentally contradict EPA's approach to the HHRA because they suggest the importance of considering risk associated with chronic exposure, whereas EPA has focused exclusively on acute exposure. *See* Aldicarb HHRA at 23. EPA mentions the Lee study only in passing, listing uncertainties acknowledged by the authors but failing to address how its risk assessment will address the uncertainty over aldicarb's carcinogenicity created by this study. Aldicarb HHRA at 43.

EPA has failed to adhere to its own Cancer Guidelines by dismissing evidence of cancer from the Lee study. None of the uncertainties justify dismissing the study, there are no demonstrated biases or confounding that would lead to a false positive finding, and the available evidence meets the criteria in the EPA Cancer Guidelines: consistency across an epidemiologic and a mechanistic study, strength of the observed association, a modest risk does not preclude a causal association, temporal relationship i.e. the exposure occurred before the effect because the AHS follows a prospective design; biological gradient as demonstrated by the positive dose-response trend, and biological plausibility shown with genotoxicity data, although in any case, a lack of mechanistic data cannot be used to reject causality, according to EPA's Cancer Guidelines. Significant exposure-response relationships were observed for colon cancer and aldicarb, and cannot be ignored.

¹⁰ Lee WJ, Sandler DP, Blair A, Samanic C, Cross AJ, Alavanja MC. Pesticide use and colorectal cancer risk in the Agricultural Health Study. *International Journal of Cancer* 2007; 121 (2): 339.